

CONFIDENTIAL DOCUMENT

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Barbara Nann/R6/USEPA/US  
02/14/2008 03:23 PM

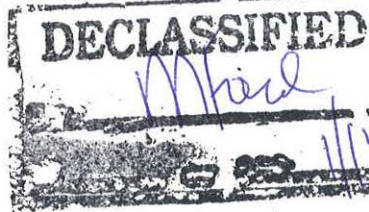
To Barbara Aldridge/R6/USEPA/US@EPA

cc

bcc

Subject Fw: Gulfco Marine--AOC removal/early RI/Delisting approach

Barbara A. Nann  
Assistant Regional Counsel  
EPA Region 6 (6RC-S)  
1445 Ross Avenue  
Dallas, TX 75202  
phone: (214) 665-2157  
fax: (214) 665-6460  
nann.barbara@epa.gov



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----- Forwarded by Barbara Nann/R6/USEPA/US on 02/14/2008 03:24 PM -----



Elizabeth.Webb@tklaw.com

02/14/2008 11:28 AM

To Barbara Nann/R6/USEPA/US@EPA

cc Sam Coleman/R6/USEPA/US@EPA, Garyg

Miller/R6/USEPA/US@EPA, Carl

Bolden/R6/USEPA/US@EPA

Subject Gulfco Marine--AOC removal/early RI/Delisting approach

Barbara,

The Gulfco Restoration Group is interested in pursuing the AOC removal action/early South Area RI/Delisting approach that you and Gary described on our call last Friday, provided that we can agree upon a suitable mechanism to document the respective new commitments of EPA and the Group and the changes to obligations that would otherwise apply under the UAO. We look forward to considering the mechanism forthcoming from EPA. The documentation needs to confirm the following points: (1) the relationship between the AOC removal action process and the UAO, (2) EPA's approval of changes on the work plan and schedule associated with acceleration of the RI for the South area and the expedited completion of all actions on the North area, (3) EPA's acknowledgement that the early RI satisfies the remaining UAO requirements for the South area, and (4) EPA's agreement to proceed with timely issuance of a No Action ROD for and delisting of the South area upon finding that no further action is required on the South.

Please let us know if we can answer any questions regarding this response.

Elizabeth Webb  
Counsel

Direct line: (512) 469-6147  
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Barbara Nann/R6/USEPA/US

03/03/2008 11:40 AM

To Garyg Miller/R6/USEPA/US@EPA, Carl  
Bolden/R6/USEPA/US@EPA, Barbara  
Aldridge/R6/USEPA/US@EPA

cc

bcc

Subject Fw: Gulfco

FYI

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----- Forwarded by Barbara Nann/R6/USEPA/US on 03/03/2008 11:41 AM -----

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Mark Peycke/R6/USEPA/US

03/03/2008 11:35 AM

To "Ms. Barbara Nann" <Nann.Barbara@epamail.epa.gov>

cc

Subject Fw: Gulfco

fyi - there is nothing for you to do at this time.

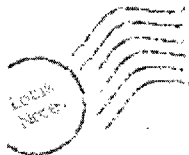
Sent by EPA Wireless E-Mail Services

Pam Phillips

----- Original Message -----

**From:** Pam Phillips  
**Sent:** 03/03/2008 11:30 AM CST  
**To:** Mark Peycke@EPA  
**Subject:** Fw: Gulfco

----- Forwarded by Pam Phillips/R6/USEPA/US on 03/03/2008 11:31 AM -----



Sam Coleman/R6/USEPA/US

03/03/2008 11:25 AM

To Lawrence Starfield/R6/USEPA/US@EPA, Charles  
Sheehan/R6/USEPA/US@EPA

cc "weber gina" <weber.gina@epa.gov>, "sanchez Connie"  
<sanchez.Connie@epa.gov>, "Pam Phillips"  
<phillips.pam@epa.gov>

Subject Re: Gulfco

I am only available on Wednesday.

The staff in coordination with HQ have made several offers to Gulfco to facilitate completion of this matter.

This is bordering on tampering with the Enforcement process in an inappropriate manner.

Scott has been briefed on more than one occasion, and has advised both me and the OSWER staff that he is comfortable with the Agency position. The outside counsel for Dow has made a point of working outside of the process to obtain an inappropriate decision based on his influence.

Samuel Coleman, PE  
Superfund Div Region 6  
214.665.6701 Ofc  
214.789.2016 Cell  
Sent by EPA Wireless E-Mail Services  
Lawrence Starfield  
----- Original Message -----

**CONFIDENTIAL**

**From:** Lawrence Starfield  
**Sent:** 03/02/2008 07:37 PM CST  
**To:** Sam Coleman; Charles Sheehan  
**Cc:** weber.gina@epa.gov; sanchez.Conn@epa.gov  
**Subject:** Gulfco

Scott Sherman called me on Friday, and asked me to look into the status of discussions at the Gulfco SF site. OSWER would like to move the site to a partial deletion or ready for reuse status, but he believes that enforcement considerations are impeding that (perhaps for very good reason).

I'd like to get a briefing on the site this week, and understand the issues.

Connie, please set something up with 6SF and ORC.

Thanks.

Larry.